

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DIANNE BAKER-PACIUS, and CHRISTOPHER J. GARRY,

Plaintiffs,

- against -

THE DEPARTMENT OF EDUCATION OF THE CITY OF NEW YORK, MELISSA AVILES-RAMOS, Chancellor; and KATHERINE RODI, Director of Employee Relations,

Defendants.

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**DECLARATION OF  
KATHLEEN M. LINNANE  
IN SUPPORT OF  
DEFENDANTS' MOTION  
TO DISMISS THE  
AMENDED COMPLAINT**

No. 25-cv-00743 (AMD)(JAM)

**KATHLEEN MAURA LINNANE** declares that the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Corporation Counsel in the office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants, the Department of Education of the City of New York, Melissa Aviles-Ramos, and Katherine Rodi, in the above-captioned proceeding.

2. I respectfully submit this declaration in support of Defendants' Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit "A" is a true and correct copy of the Martin F. Scheinman Impact Arbitration Agreement, dated September 10, 2021.

4. Attached hereto as Exhibit "B" is a true and correct copy of the Right to Sue Letters issued to Plaintiffs by the U.S. Equal Employment Opportunity Commission.

5. Attached hereto as Exhibit "C" is a true and correct copy of the Notices of Claim filed by Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 21, 2025

**MURIEL GOODE-TRUFANT**  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
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By: /s/ Kathleen M. Linnane

Kathleen M. Linnane  
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